

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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JINO KURIAKOSE, Individually and On	:	Civil Action No. 1:08-cv-7281 (JFK)
Behalf of All Others Similarly Situated,	:	
	:	
Plaintiff,	:	
	:	
vs.	:	
	:	
FEDERAL HOME LOAN MORTGAGE	:	
COMPANY, RICHARD SYRON, PATRICIA	:	
L. COOK, and ANTHONY S. PISZEL,	:	
	:	
Defendants.	:	
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**DECLARATION OF DAVID J. GEORGE IN SUPPORT OF LEAD PLAINTIFF'S
MOTION TO PARTIALLY LIFT THE PSLRA DISCOVERY STAY AND
INCORPORATED MEMORANDUM OF LAW IN SUPPORT THEREOF**

I, David J. George, declare that:

1. I am an attorney with the Boca Raton, Florida office of Coughlin Stoia Geller Rudman & Robbins LLP, counsel for Lead Plaintiff Central States, Southeast and Southwest Areas Pension Fund ("Central States") in this proceeding. I submit this Declaration in support of Lead Plaintiff's Motion to Partially Lift the PSLRA Discovery Stay. Unless otherwise stated, the following facts are within my personal knowledge or are based on a review of public records.

2. Attached hereto as Exhibit 1 is a true and correct copy of the Statement of Richard F. Syron Before the Committee on Oversight and Government Reform, United States House of Representatives, December 9, 2008, obtained from the website of the U.S. House of Representatives Committee on Oversight and Government Reform (<http://oversight.house.gov/documents/20081209103407.pdf>) on April 14, 2009.

3. Attached hereto as Exhibit 2 is a true and correct copy of the Form 8-K filed with the SEC on September 29, 2008 by the Federal Home Loan Mortgage Corporation ("Freddie Mac"), obtained through Edgar on April 17, 2009.

4. Attached hereto as Exhibit 3 is a true and correct copy of the relevant excerpt of the Form 10-K filed with the SEC on March 11, 2009 by Freddie Mac, obtained through Edgar on April 14, 2009.

5. Attached hereto as Exhibit 4 is a true and correct copy of the March 2, 2009 Financial Times article *Freddie Mac chief quits after six months*, obtained from the Financial Times website (http://www.ft.com/cms/s/0/d1b7c1d4-073a-11de-9294-000077b07658,dwp_uuid=9c00e8fe-07df-11de-8a33-0000779fd2ac.html) on April 14, 2009.

6. Attached hereto as Exhibit 5 is a true and correct copy of the March 12, 2009 Associated Press article *Freddie Mac Posts \$23.9 Billion Loss; More Aid Wanted*, obtained from the New York Times website (http://www.nytimes.com/2009/03/12/business/12freddie.html?_r=1) on April 14, 2009.

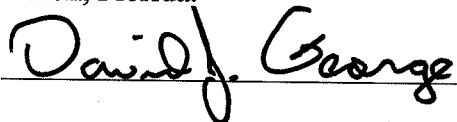
7. In the course of Lead Plaintiff's investigation, numerous former employees of Freddie Mac have refused to provide any information to Lead Plaintiff concerning their time at Freddie Mac due to language in their severance agreements preventing these former employees from doing soon information and belief, the "Non Participation" clauses in the severance agreements contain the following language:

You acknowledge that in the absence of this agreement you have the right voluntarily to assist others in bringing claims against the released parties. By signing below, you agree to waive this right. Therefore, except as otherwise provided in the agreement, you agree that you will not encourage, counsel or assist any attorney, their clients, or any other person (including current or former Freddie Mac employees) in bringing or prosecuting any claim, charges, or complaints against the released parties, unless pursuant to a valid subpoena or court order to produce documents

or testify, or unless you have been requested by an agency of the United States government or state or local government (collectively "government agency") to assist in a government agency investigation or proceeding. To the extent that you are requested by any government agency to participate or assist in a government agency investigation or proceeding, or to the extent that any law may prohibit you from waiving your right to bring or participate in the investigation of a claim, you nevertheless waive any right you otherwise might have to seek or accept any damages or release in any proceeding. Furthermore, to the extent that you file any claim against Freddie Mac or any claim is filed on your behalf against Freddie Mac, you agree not to seek or accept any damages or other relief as a result of such claims.

I declare under penalty of perjury under the laws of the United States of America, 28 U.S.C. § 1746, that the foregoing is true and correct.

Executed this 17 day of April, 2009, at Boca Raton, Florida.


David J. George

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing was sent by e-mail and FedEx to the following persons on April 17, 2009:

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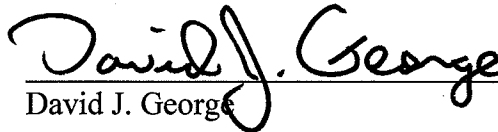
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